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Honorable Judge Edward F. Shea

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

TAMARA MARIE CORTER, a married  
individual,

NO. CV-12-173-EFS

PLAINTIFF,

STIPULATED ORDER OF  
PROTECTION

VS.

DOUGLAS COUNTY, a political subdivision  
of the State of Washington; STEVE  
GROSECLOSE, individually, and as an agent of  
Douglas County;

DEFENDANTS.

THE PARTIES HERETO, by and through their respective counsel, agree and  
stipulate as follows:

1. Plaintiff possesses a variety of documents which include, in particular, her health  
care records and her and her family's income tax records. These types of documents and/or  
information are often privileged and confidential and protected from public disclosure. Similarly,  
Douglas County and the individual defendant, Steve Groseclose, may also possess documents  
which may be privileged, confidential and protected from public disclosure.

2. Plaintiff desires to produce the above-described documents to comply with  
discovery requests that may have some reasonable relevance to the claims, damages, and  
defenses in this case. However, Plaintiff also has concerns about the disclosure of this

STIP. PROT. ORDER - 1

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1 information and these materials, particularly, but not limited to, disclosure to the individually-  
2 named defendant herein and possible uses of the information outside the scope of this instant  
3 case. These concerns are based on past and ongoing state court litigation between the plaintiff  
4 and the individually-named defendant related to the custody of their common child. A protective  
5 order granted by the court will minimize the potential harm from limited disclosure of these  
6 confidential files.  
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9 4. The parties agree that certain documents produced by Plaintiff in this matter, in  
10 particular any documents or records related to, or reflecting, any aspect of Plaintiff's health care  
11 (e.g. medical records, pharmacy records, mental health records of any kind, etc.) shall not be  
12 disclosed or made available to any person or entity except as provided in this stipulation, and  
13 shall be used only for purposes of U.S. District Court Cause No. CV-12-173-EFS. They shall be  
14 disclosed only to counsel in this case who have executed this stipulation, and only to witnesses  
15 where disclosure to a witness is necessary for the purposes of the case. Prior to delivery of these  
16 documents to any witness, the witness shall first read this stipulation and agree to be bound by its  
17 terms. For purposes of this stipulation, disclosure to counsel includes disclosure to the  
18 employees of counsel, including secretarial and paralegal assistants, as necessary to assist in the  
19 preparation of this case.  
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21 5. Plaintiff believes that many of the requested documents are not relevant to the  
22 issues in this case, and are not admissible. They are nevertheless being produced in the interest  
23 of open disclosure and furthering the discovery process. The potential use at trial of all  
24 documents referred to in this stipulation will be governed by the court rules, evidence rules and  
25 federal law.  
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6. After receiving and reviewing records disclosed by Plaintiff in this case, Defendants shall have the right to contest that the records or any portion thereof are entitled to confidentiality or should be protected from disclosure unrelated to this case. In that event, any contesting Defendant shall give Plaintiff at least fourteen (14) days prior electronic notice of said contention and by specifically describing the record(s) at issue. Plaintiff shall then have the opportunity to move for a ruling of protection by the court. In the event the Plaintiff does not move for protection of the records designated by any defendant within fourteen (14) days after receiving electronic notice, then this order of protection shall lapse with respect to those designated records and Defendants will be free to disseminate same as Defendants see fit.

7. After dismissal, settlement, or entry of a verdict, the terms of this stipulation and order will remain in effect as to any portion of the documents covered under this stipulation, and not made public in these proceedings, subject to modification by court order.

8. The terms of this stipulation may be modified or revoked by the parties to this agreement only by written agreement of all parties or by court order.

DATED this 13th day of February, 2013. DATED this 13th day of February, 2013.

VAN SICLEN STOCKS AND FIRKINS

EVANS, CRAVEN & LACKIE, P.S.

/s/ Michael J. Kelly  
Michael J. Kelly, WSBA #31816  
Attorney for Plaintiff

/s/ Heather Yakely  
Heather Yakely, WSBA #28848  
Attorneys for Defendant Steve Groseclose

1 DATED this 13th day of February, 2013.

2 JEFFERS, DANIELSON, SONN &  
3 AYLWARD, P.S.

4  
5 /s/ Stanley A. Bastian  
6 Stanley A. Bastian, WSBA #13415  
7 Kyle J. Silk-Eglet, WSBA #43177  
8 Attorneys for Defendant Douglas County  
9

10 **ORDER**

11  
12 PURSUANT TO THE FOREGOING STIPULATION IT IS SO ORDERED.  
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14 DONE IN OPEN COURT this 14th day of February, 2013.  
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16  
17 s/ Edward F. Shea  
18 HONORABLE EDWARD F. SHEA  
19 United States District Judge  
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